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1. Central, searchable transparency database		
2. Minimum standards for the description of meetings		
3. Monthly transparency releases		
4. Meetings with senior civil servants covered in transparency releases		
5. Meetings with Special Advisers covered in transparency releases		
6. Including informal lobbying and lobbying via alternative communications		
7. Updated guidance on informal lobbying via alternative forms of communication		
8. Accountability for transparency releases		

Lobbying register	Commitments by previous government	Commitments by new government
9. Lobbying register includes meetings with senior civil servants and special advisors		
10. More details of meetings in the lobbying register		
11. Closing loopholes in the lobbying register		
12. Requirement for lobbyists to abide by a code of conduct		



Fully met



Partially met



Rejected or no commitment made

Transparency around Lobbying, responses to recommendations by CSPL and PACAC	Committed to by previous government	New government
<p>1. Central, searchable transparency database</p> <p>CSPL: "The Cabinet Office should collate all departmental transparency releases and publish them in an accessible, centrally managed and searchable database."</p> <p>PACAC: "We welcome the Government's commitment to producing an integrated platform for transparency data. We will be watching closely the system's progress towards completion and its impact once it is operational."</p>	<p>"The Cabinet Office is developing a single database to collate and publish departments' transparency returns, which cover meetings, gifts, hospitality and travel. This will provide a single public source of transparency data, replacing the system of separate publications."</p>	<p>No public commitment. <u>The government has only committed (in October 2024) to "a register of Ministers' gifts and hospitality on a basis broadly equivalent to that which is published in the registers of Members' and Lords' interests"</u> but this does not include meetings.</p>
<p>2. Minimum Standards for the Description of Meetings</p> <p>CSPL: "The Cabinet Office should provide stricter guidelines on minimum standards for the descriptions of meetings and <u>ensure compliance by government departments.</u>"</p> <p>PACAC: "We would expect the descriptions of the meetings to include, at a minimum, details of the policy area and any specific regulations, legislation, or funding under discussion."</p>	<p><u>New guidance was published in April 2024.</u></p>	<p>Most recent transparency releases show the guidance is not being followed closely and that compliance does not appear to be being monitored properly. This may be because much of the data relates to meetings under the previous government, so the next release of transparency data will reveal if the new government is ensuring compliance.</p>
<p>3. Monthly transparency releases</p> <p>CSPL: "The government should publish transparency returns monthly, rather than quarterly, in line with the MPs' and peers' registers of interests."</p> <p>PACAC: "Once the platform is operational, we expect the Government to move swiftly from quarterly to monthly transparency publication."</p>	<p>"Following the development, deployment, and adoption of an integrated transparency platform, the Government will look to move departments' transparency publications from a quarterly to a monthly basis"</p>	<p><u>Government has said that "transparency data for ministerial meetings and overseas travel, special advisers and senior officials will continue to be published quarterly."</u></p>
<p>4. Meetings with senior civil servants covered in transparency releases</p> <p>CSPL: "The government should include meetings held between external organisations, directors general, and directors in transparency releases."</p>	<p>"The Government agrees that transparency obligations should be extended to all Directors General, Finance and Commercial Directors, and Senior Responsible Owners in the Government's Major Projects Portfolio, reflecting Senior Civil Service roles most likely to be subject to lobbying approaches"</p>	<p>Releases now reflect meetings held with these officials.</p>



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Transparency around Lobbying, responses to recommendations by CSPL and PACAC	Committed to by previous government	New government
<p>5. Ensuring meetings with Special Advisers are covered in transparency releases</p> <p><u>CSPL</u>: “The government should include meetings held between external organisations and special advisers in transparency releases.”</p> <p><u>PACAC</u>: “Government should include Spads’ meetings in the departmental transparency releases on the same basis as those of Ministers and senior civil servants.”</p>	<p><u>The last government extended the transparency obligations to additional categories of senior officials but not special advisers.</u></p> <p>“The Government does not believe that transparency obligations should be extended to equivalent Special Advisers, as unlike Ministers and Senior Civil Servants (via the Carltona Principle, Special Advisers cannot authorise public expenditure nor exercise any statutory powers.”</p>	<p>No commitment made so far to extending transparency obligations to special advisers – awaiting government response to PACAC.</p>
<p>6. Including informal lobbying and lobbying via alternative communications</p> <p><u>CSPL</u>: “The government should revise the categories of published information to close the loophole by which informal lobbying is not disclosed in departmental releases.”</p> <p><u>PACAC</u>: “If WhatsApp and other Non-Corporate Communication Channels (“NCCCs” are to be used in government and, in particular, if they are to be used to communicate with third parties, then they should be subject to the same disclosure regime as other forms of contact.”</p>	<p>“The Government will be expanding transparency obligations to include the disclosure of diarised phone calls and virtual meetings which occur in place of an in-person meeting. The Government does not believe that transparency obligations should include letters, WhatsApps, impromptu phone calls or emails, which do not alone evidence a substantive lobbying engagement. Where an ‘informal’ lobbying approach is granted time or resource by Government, it should result in a diarised engagement and therefore be recorded.”</p>	<p>No commitment made so far to go further and implement CSPL in full but awaiting government response to PACAC.</p>
<p>7. Updated guidance on informal lobbying via alternative forms of communication</p> <p><u>CSPL</u>: “The government should update guidance to make clear that informal lobbying, and lobbying via alternative forms of communication such as WhatsApp or Zoom, should be reported to officials.”</p>	<p><u>New guidance was issued in 2023</u> however, it stopped short of making clear that informal lobbying via alternative routes should be reported. Instead the guidance suggests that ministers and senior officials “consider including private office staff in communications groups” and tasking them to capture ‘significant information’. This also only applies to information that materially impacts the direction of work.</p>	<p>No commitment made so far to go further.</p>
<p>8. Accountability for transparency releases</p> <p><u>PACAC</u>: “There should be a single Senior Responsible Owner for transparency publication whose role is to ensure the information contained is both comprehensive and timely.”</p>	<p><u>The government rejected this</u> saying that the Permanent Secretary and Ministers would account for releases.</p>	<p>No commitment made so far – awaiting government response to PACAC report.</p>



Fully met



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Transparency around Lobbying, responses to recommendations by CSPL and PACAC	Committed to by previous government	New government
<p>9. Lobbying register includes meetings with senior civil servants and special advisors</p> <p>CSPL: "Consultant lobbyists should also have to register on the basis of any communications with special advisers, directors general, and directors."</p> <p>PACAC: "in line with the Government's proposed extension of the transparency releases to include Directors General, Departmental Financial and Commercial Directors, and Senior Responsible Owners for Major Projects, as well as our recommendation that they include Ministerial Special Advisers, declarations in the Register should be extended to include lobbying of these groups."</p>	<p>"The Government accepts in principle that the scope of departments' transparency returns should be mirrored in the requirements of the Register of Consultant Lobbyists. However, the Government will be assessing the impact of expanded transparency returns on departments before introducing such a change in primary legislation."</p>	<p>No commitment made so far - awaiting government response to PACAC.</p>
<p>10. More details of meetings in the lobbying register</p> <p>CSPL: "Consultant lobbyists should have to declare the date, recipient, and subject matter of their lobbying."</p> <p>PACAC: "should contain not only a list of clients, as it currently does, but also the subject of lobbying, dates of lobbying, and the medium through which lobbying took place."</p>	<p>"The Government agrees in principle that consultant lobbyists should have to declare the subject matter of their lobbying in sufficient detail for a third party to understand the nature of the approach, and will look to implement this via secondary legislation."</p>	<p>No commitment made so far - awaiting government response to PACAC.</p>
<p>11. Closing loopholes in the lobbying register</p> <p>PACAC: "the exemption from registration for consultant lobbyists who do not pay VAT should be removed... If the Government maintains that there is a need for the incidental exemption, it must amend the Act to clarify its purpose and remove any ambiguity about what that is and when it can apply."</p>	<p>No commitment made.</p>	<p>No commitment made so far - awaiting government response to PACAC.</p>
<p>12. Requirement for lobbyists to abide by a code of conduct</p> <p>PACAC: Ministers and officials "should only meet with lobbyists who are included in one of the established industry registers and subscribe to their codes of conduct."</p>	<p>No commitment made.</p>	<p>No commitment made so far - awaiting government response to PACAC.</p>



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